

**EXHIBIT 31**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:	)	)	)
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO	)	PROMESA Title III	)
as representative of	)	Case No. 17-BK-03283 (LTS)	)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>	)	)	)
Debtors. <sup>1</sup>	)	)	)
In re:	)	)	)
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	)	PROMESA Title III	)
as representative of	)	Case No. 17-BK-03566 (LTS)	)
THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,	)	)	)
Debtor.	)	)	)
THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT	)	Adv. Proc. No. 19-00359 (LTS)	)

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK- 4780) (Last Four Digits of Federal Tax ID: 3747).

BOARD FOR PUERTO RICO, ACTING BY AND )  
THROUGH ITS MEMBERS, )  
and )  
THE OFFICIAL COMMITTEE OF UNSECURED )  
CREDITORS OF ALL TITLE III DEBTORS )  
(OTHER THAN COFINA), )  
as co-trustees of )  
THE EMPLOYEES RETIREMENT SYSTEM OF THE )  
GOVERNMENT OF PUERTO RICO, )  
Plaintiff, )  
v. )  
DEFENDANT 1H-78H, )  
Defendants. )  
----- X )

- X

**PUERTO RICO FUNDS' SUPPLEMENTAL RESPONSE  
TO INTERROGATORY NO. 17**

Pursuant to Rules 7026 and 7033 of the Federal Rules of Bankruptcy Procedure, and Federal Rules of Civil Procedure 26 and 33 incorporated therein, made applicable to this proceeding by 48 U.S.C. § 2170, and in connection with Adversary Proceeding No. 19-00359, Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico Fixed Income Fund VI, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., Tax-Free Puerto Rico Target Maturity Fund, Inc., and UBS

IRA Select Growth & Income Puerto Rico Fund (collectively, the “Puerto Rico Funds”), hereby supplement their response to Interrogatory No. 17 of the First Set of Interrogatories to the ERS Bondholder Groups from the Committees and Government Parties, dated November 1, 2019 (“Interrogatories”). The Puerto Rico Funds further reserve the right to supplement, amend, or modify these objections and responses as necessary.

### **INCORPORATION OF PRIOR GENERAL OBJECTIONS**

1. On December 3, 2019, Bondholders served their Responses And Objections To The Interrogatories (“Bondholders’ Original Responses and Objections”).
2. The Puerto Rico Funds hereby incorporate the General Objections in Bondholders’ Original Responses and Objections into each and every individual response and supplemental response, whether or not the General Objections are restated in the response or supplemental response to any particular Interrogatory. The Puerto Rico Funds’ responses and supplemental responses are made without waiving, or intending to waive, the General Objections, and the Puerto Rico Funds specifically reserve all of their other objections.

### **SUPPLEMENTAL RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 17:** State the date(s) when each You purchased Your ERS Bonds.

**Original Response to Interrogatory No. 17:** Bondholders object that this Interrogatory seeks confidential, proprietary information. Bondholders further state that they will provide their respective purchase dates subject to and upon entry of a mutually satisfactory protective order governing these proceedings.

**Supplemental Response to Interrogatory No. 17:** Subject to and without waiving their objections, the Puerto Rico Funds state that they purchased their ERS Bonds on the following dates<sup>2</sup>:

**Puerto Rico AAA Portfolio Bond Fund, Inc.:**

February 11, 2016; February 12, 2016; February 17, 2016; February 23, 2016; February 29, 2016

**Puerto Rico AAA Portfolio Bond Fund II, Inc.:**

January 25, 2008; January 27, 2016

**Puerto Rico AAA Portfolio Target Maturity Fund, Inc.:**

May 28, 2008

**Puerto Rico Fixed Income Fund, Inc.:**

January 25, 2008; January 30, 2008; May 28, 2008; March 17, 2016

**Puerto Rico Fixed Income Fund II, Inc.:**

January 25, 2008; May 28, 2008; July 30, 2013

**Puerto Rico Fixed Income Fund III, Inc.:**

January 25, 2008; May 28, 2008; September 12, 2008

**Puerto Rico Fixed Income Fund IV, Inc.:**

January 25, 2008; May 28, 2008; September 29, 2010; March 10, 2016

**Puerto Rico Fixed Income Fund V, Inc.:**

January 25, 2008; January 30, 2008; May 28, 2008

**Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc.:**

January 25, 2008; May 28, 2008

**Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc.:**

January 25, 2008; October 27, 2011; May 8, 2013

**Tax-Free Puerto Rico Fund, Inc.:**

January 25, 2008; May 28, 2008; June 15, 2010

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<sup>2</sup> Puerto Rico Fixed Income Fund VI, Inc. and UBS IRA Select Growth & Income Puerto Rico Fund do not hold ERS Bonds.

**Tax-Free Puerto Rico Fund II, Inc.:**

May 28, 2008; June 23, 2008; May 13, 2010; May 27, 2011

**Tax-Free Puerto Rico Target Maturity Fund, Inc.:**

May 28, 2008; July 8, 2010; July 9, 2010; July 13, 2010; July 14, 2010; September 27, 2010;  
September 30, 2010

*[Signatures on Next Page]*

In San Juan, Puerto Rico, today January 24, 2020.

/s/ Alicia I. Lavergne-Ramírez

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 24, 2020, a true and correct copy of the foregoing was served via electronic mail to the persons listed below:

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